

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

**ANDREW ROBERT MCLELLAN FILE #1005360-1976:
d/b/a ANDREW ROBERT MCLELLAN**

CASE NO.: 24-12201 AMC

CHAPTER: 13

OBJECTIONS OF DENI CARISE TO DEBTOR'S CHAPTER 13 PLAN

AND NOW COMES, Deni Carise ("Mortgager"), a secured creditor and mortgage lien holder on real property owned by the Debtor and located at 4159 White Horse Road, Malvern, Chester County, Pennsylvania, 19355 ("The Property"), by its attorneys, Campbell Rocco Law, LLC, Edmund J. Campbell, Jr., Esq., who hereby aver as follows:

1. Mortgagee is a secured creditor by way of a mortgage representing a lien on the Property.
2. Debtor filed the instant Chapter 13 Bankruptcy Petition on June 26, 2024.
3. Mortgagee filed a Proof of Claim on August 28, 2024 (claim no. 6).
4. As of the date of the filing of the instant Chapter 13 petition, the Debtor had mortgage arrears totaling \$654,662.60.
5. Debtor's Chapter 13 Plan does not provide for treatment in Part 4 of the Plan for Secured Creditors.
6. The Debtor has proposed treatment in Part 9 of the Plan. The treatment is unclear and Secured Creditor objects to any treatment that would not result in payment of the full amount of arrears set forth in the filed Proof of Claim as well as post petition payments.

WHEREFORE, Deni Carise prays and respectfully requests that the Debtor be required to file an Amended Chapter 13 Plan providing for full payment of arrears due Mortgagee as outline in the Proof of Claim filed of record along with ongoing post petition payments.

Dated: September 6, 2024

/s/ Edmund J. Campbell, Jr., Esq.
Edmund J. Campbell, Jr., Esq.
Court ID No. 63587